

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2020-125-E**

In re:

Application of Dominion Energy South  
Carolina, Incorporated for Adjustment  
of Rates and Charges (See Commission  
Order No.2020-313)

**PETITION TO INTERVENE**

Pursuant to R.103-825 of the South Carolina Code of Regulations, Sierra Club hereby petitions to intervene in the above-captioned docket. In support of this petition, Sierra Club states as follows:

1. On August 14, 2020, Dominion Energy South Carolina, Inc. (“Dominion” or the “Company”) filed its Application for Adjustment of Rates and Charges with the Public Service Commission of South Carolina (“Commission”).
2. The Commission has not yet issued a scheduling order in this case or a deadline for parties to file a Notice of Intervention.
3. Sierra Club is a nonprofit conservation organization incorporated in California. It currently represents almost 800,000 dues-paying members nationwide and approximately 6,920 dues-paying members in South Carolina. The Club’s mission is to explore, enjoy, and protect the wild places of the Earth; to practice and promote the responsible use of the Earth’s ecosystems and resources; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives. In

furtherance of this mission, the Sierra Club and the Sierra Club's South Carolina Chapter works to accelerate the transition from fossil fuels to clean energy solutions and advocates for state and federal policies and industry action to achieve this transition. Sierra Club has a long history of working to reduce pollution from coal-fired power plants and promoting clean energy sources in the Southeast.

4. The Club has participated as intervenors in multiple proceedings before the Commission, including, most recently, docket nos. 2019-226-E, 2018-322-E, 2018-321-E, 2018-319-E, 2018-318-E, 2017-370-E, 2017-305-E, 2017-207-E, 2016-223-E, 2015-103-E, 2015-55-E, 2015-54-E, and 2015-53-E.

5. Sierra Club and its more than 6,920 members who live in South Carolina—approximately half of which are Dominion customers—have a direct and substantial interest in this proceeding. The Company is seeking a 7.7% rate increase and seeks to justify part of the requested rate increase by identifying costs incurred in connection with environmental regulatory compliance. The Company's request implicates Sierra Club's organizational mission and interests. Moreover, Sierra Club's members who receive electricity service at their homes and businesses from the Company will be affected by the decisions of the Commission in this and future related proceedings.

6. Sierra Club and its members have an interest in ensuring that any rate increase, and the associated rate structures approved by the Commission, advance the important objectives of promoting cost-saving clean energy, efficiencies, and distributed generation, and avoid disproportionate and unreasonable burdens on low-income South Carolinians. No other party will adequately represent Sierra Club's interests in this case.

7. Sierra Club seeks to intervene in this proceeding to ensure that its organizational interests and those of its members are represented in the Commission's decision-making process regarding the Company's request for a rate increase and any changes to the existing rate structure. Sierra Club's involvement in this proceeding will promote its members' interests as well as the broader public interest.

8. The address of the Sierra Club's principal office in South Carolina is 1314 Lincoln Street, Columbia, South Carolina 29201.

9. Pursuant to R.103-804(T) and R.103-805 of the South Carolina Code of Regulations, counsel representing Sierra Club in this proceeding is:


Robert Guild  
314 Pall Mall Street  
Columbia, SC 29201  
Tel: (803) 917-5738  
Email: bguild@mindspring.com

10. Sierra Club consents to service via electronic mail and requests that all communications regarding this docket should be directed to Sierra Club's counsel of record and:

Dori Jaffe  
50 F St NW, 8<sup>th</sup> Floor  
Washington, DC 20001  
Tel: (202) 675-6275  
Email: dori.jaffe@sierraclub.org

WHEREFORE, Petitioners pray that they be allowed to intervene as a party of record in this proceeding.

Respectfully submitted this 24th day of August, 2020.

on behalf of  
Robert Guild  
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314 Pall Mall Street  
Columbia, SC 29201  
(803) 917-5738  
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**CERTIFICATE OF SERVICE**

I hereby certify that I have served the persons listed on the official service list for Docket  
No. 2020-125-E, listed below, a copy of the Petition to Intervene of Sierra Club via electronic  
mail on this 24<sup>th</sup> day of August, 2020.

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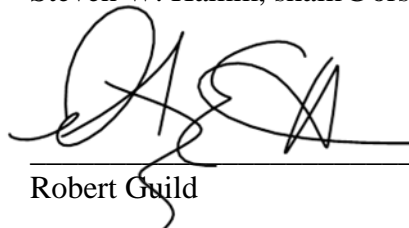
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on behalf of  
Robert Guild